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The Trusted Integrator for Sustainable Solutions

REMOVAL SUPPORT TEAM 2
EPA CONTRACT EP-W-06-072

January 15, 2014

Mr. Angel Rodriguez, On-Scene Coordinator
U.S. Environmental Protection Agency
Response and Prevention Branch
Caribbean Environmental Protection Division, Region II
1492 Peñuelas De Leon Ave., Suite 417
San Juan, PR 00907-4127

EPA CONTRACT No.: EP-W-06-072

TDD No.: TO-0029-0122

DOCUMENT CONTROL No.: RST 2-02-F-2689

**SUBJECT: PHASE IIIB REMOVAL ASSESSMENT SAMPLING TRIP REPORT –
PUERTO RICO OLEFINS ASBESTOS SITE, PEÑUELAS, PUERTO RICO**

Dear Mr. Rodriguez,

Enclosed please find the Phase IIIB Removal Assessment Sampling Trip Report for the wipe sampling activities conducted on December 17 through 19, 2013 at the Tallaboa Encarnación Community as part of the Puerto Rico Olefins Asbestos Site Removal Assessment located in Peñuelas, Puerto Rico. If you have any questions or comments, please do not hesitate to contact me at (787) 354-2489.

Sincerely,

Weston Solutions, Inc.

For Carlos Huertas
RST 2 Site Project Manager

Enclosure

cc: TDD File No.: TO-0029-0122

**PHASE IIIB REMOVAL ASSESSMENT
SAMPLING TRIP REPORT
PUERTO RICO OLEFINS ASBESTOS SITE
PEÑUELAS, PUERTO RICO**

Prepared for:

U.S. Environmental Protection Agency
Region II – Response and Prevention Branch
Edison, New Jersey 08837

Prepared by:

Removal Support Team 2
Weston Solutions, Inc.
East Division
Edison, New Jersey 08837

DC No.: RST 2-02-F-2689
TDD No.: TO-0029-0122
EPA Contract No.: EP-W-06-072

January 2014

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PHASE IIIB REMOVAL ASSESSMENT SAMPLING TRIP REPORT

SITE NAME: Puerto Rico Olefins Asbestos Site –
(Tallaboa Encarnación Community)

DC No.: RST 2-02-F-2689

TDD No.: TO-0029-0122

SAMPLING DATES: December 17 through 19, 2013

1. Site Location: Peñuelas, Puerto Rico (17°59'49.37"N / 66°43'10.17"W)
Refer to Attachment A, Figure 1: Site Location Map.

2. Sample Descriptions: 27 wipe samples, including two field blanks. Refer to Attachment A, Figure 2: Wipe Sample Location & Analytical Results Map and Attachment B, Table 1: Sample Collection Information

3. Laboratory Receiving Samples:

Lab Name/Location	Sample Type	Parameters
EMSL Analytical, Inc. 200 Route 130 North Cinnaminson, NJ 08077	Wipe	Asbestos

4. Sample Dispatch Data:

On December 18, 2013, Weston Solutions Inc., Removal Support Team 2 (RST 2) shipped 20 wipe samples, including one field blank, to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under Chain of Custody (COC) Number (No.) 2-121813-114511-0011 and FedEx Airbill No. 804298940294. On December 20, 2013, RST 2 shipped seven wipe samples, including one field blank, to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under COC No. 2-122013-105549-0012 and FedEx Airbill No. 804298938434. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.

5. Personnel On Site:

<u>Name</u>	<u>Representing</u>	<u>Duties On-Site</u>
Angel Rodriguez	U.S. EPA, Region II	On-Scene Coordinator
Geoffrey Garrison	U.S. EPA, Region II	On-Scene Coordinator
Carlos Huertas	RST 2, Region II	Site Project Manager, Field Coordinator, Site Health and Safety, Sample Collection and Sample Management
Emilio Betancourt	RST 2, Region II	Sample Collection and Sample Management
Joel Petty	RST 2, Region II	Sample Collection, Site QA/QC and Sample Management

6. Site Background:

The Puerto Rico Olefins Asbestos Site (the Site) is located at Road 385, KM 5.4, Tallaboa, Poniente Peñuelas, Puerto Rico. During a visual inspection, the U.S. Environmental Protection Agency (EPA) identified fugitive dust clouds migrating out of the facility during demolition activities conducted by HOMECA Inc. Beginning in 2010 and continuing until the present, an asbestos abatement occurred at the Site. Improper asbestos abatement techniques may have been used at the Site resulting in potential asbestos contamination throughout the Site and in residential neighborhoods downwind of the Site.

On November 21, 2013, as part of Phase I of the Removal Assessment, the EPA On-Scene Coordinator (OSC), EPA Air Program representative, and RST 2 mobilized to the Site to perform multi-media sampling. As directed by the EPA OSC, RST 2 collected five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using Polarized Light Microscopy (PLM). Soil samples were collected and submitted for asbestos analysis via modified EPA 600/R-93/116 Method using Transmission Electron Microscopy (TEM) with California Air Resource Board (CARB) 435 prep. Wipe samples were collected and submitted for asbestos analysis via American Society for Testing Materials (ASTM) 6480-05 Method. Samples were collected from outside areas where suspected asbestos contamination may have occurred and inside areas where asbestos may have entered the building.

On December 13, 2013, as part of Phase I of the Removal Assessment, the EPA OSC and RST 2 remobilized to the Site to collect two additional bulk samples. The additional bulk samples were collected from two specific locations as directed by the EPA OSC. The two bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using PLM. Samples were collected from outside areas where suspected asbestos contamination may have occurred.

Based on the validated analytical results of the samples collected as part of Phase I of the Removal Assessment, asbestos was detected in bulk samples ranging from non-detect to 40 percent (%) amosite and 20% chrysotile, in soil samples ranging from 3 amosite/chrysotile asbestos structures to 9 amosite/chrysotile asbestos structures, and in wipe samples ranging from 7,760 structures per square centimeter (str/cm²) to 374,000 str/cm². The two additional bulk samples collected on December 13, 2013 were both non-detect for asbestos. The wipe blank sample was non-detect for asbestos.

On December 4 and 5, 2013, as part of Phase II of the Removal Assessment, the EPA OSC and RST 2 mobilized to the Jorge Lucas Perez Valdivieso School, located approximately 0.25 miles south of the Site, to conduct air sampling activities within classrooms identified by the EPA OSC. The school is separated into two areas referred to be RST 2 as Area 1 and Area 2. The two separate areas are separated by a road way. As directed by the EPA OSC, RST 2 established three air sampling stations within eight of the schools classrooms (CR01 through CR08). Air samples were collected from each of the established air sampling stations within each classroom but per the request of the EPA OSC only one of the air samples from each of the classrooms was submitted for asbestos analysis.

On December 5, 2013, as part of Phase II of the Removal Assessment, RST 2 shipped 11 air samples, including two lot blanks and one field blank, to the EMSL Analytical, Inc. laboratory for asbestos analysis via Method ISO 10312 - International Standard for the Determination of Asbestos Fibers - Direct Transfer. Per the request of the EPA OSC, on December 13, 2013, RST 2 shipped the additional two air samples collected on December 4, 2013 from classroom CR01 to the EMSL Analytical, Inc. laboratory for asbestos analysis via Method ISO 10312 - International Standard for the Determination of Asbestos Fibers - Direct Transfer.

Based on the validated analytical results of the samples collected as part of Phase II of the Removal Assessment, chrysotile asbestos was detected in eight of the 10 field air samples submitted for asbestos analysis. The total number of asbestos structures in the positive detections ranged between 2 and 25. The reported concentrations in the positive detections ranged between 0.0004 structures per centimeter (s/cc) and 0.0032 s/cc.

On December 12 and 13, 2013, as part of Phase IIIA of the Removal Assessment, the EPA OSC and RST 2 mobilized to the Jorge Lucas Perez Valdivieso School to perform wipe sampling within the classrooms of the school. As directed by the EPA OSC, RST 2 collected three wipe samples from each classroom. The areas identified in each classroom to be sampled were the entrance, near a window, and the dustiest area in the room. A total of 90 wipe samples, including five field blanks and one lot blank, were collected from 28 classrooms (CR01 through CR29, excluding CR27). Classroom CR27 and some other general areas of the school were not sampled due to the fact that the areas were not accessible or as directed by the EPA OSC. Wipe samples were collected and submitted for asbestos analysis via ASTM 6480-05 Method.

Based on the validated analytical results of the samples collected as part of Phase IIIA of the Removal Assessment, asbestos was detected in wipe samples ranging from non-detect to 363,000 str/cm². The wipe blank samples were non-detect for asbestos.

As part of Phase IIIB of the investigation, RST 2 was tasked with conducting wipe sampling throughout the Tallaboa Encarnación Community.

7. Phase IIIB Removal Assessment Summary:


On December 17 through 19, 2013, the EPA OSC and RST 2 mobilized to the Tallaboa Encarnación Community to perform wipe sampling on the exterior of several properties. As directed by the EPA OSC, the areas identified to be sampled had to be exposed to ambient air, but not exposed to rain or have not been cleaned recently. A total of 27 wipe samples, including two field blanks, were collected from 24 properties (P0005 through P0028). Wipe samples were collected and submitted for asbestos analysis via ASTM 6480-05 Method. Refer to Attachment D for the Photographic Documentation Log for the Phase IIIB Removal Assessment sampling event.


Surface dust samples were collected from areas where suspected asbestos contamination may have occurred (*i.e.*, exposed to ambient air, but not exposed to rain or have not been cleaned recently), utilizing dedicated Ghost WipesTM. Samples were collected following the general

guidance within the HUD Guidelines, Chapter 5: Risk Assessment. Each sample was collected from a 10 cm by 10 cm square (100 cm²) area utilizing EPA Environmental Response Team (ERT) Standard Operating Procedure (SOP) Nos. 2001, General Field Sampling Guidelines and 2011, Chip, Wipe, and Sweep Sampling, as well as NIOSH Method 9100, as guidance.

8. Analytical Discussion:

Based on the validated analytical results of the samples collected as part of Phase IIIB of the Removal Assessment, asbestos was detected in wipe samples ranging from non-detect to 32,200,000 str/cm². The wipe blank samples were non-detect for asbestos. Refer to Attachment B, Table 2: Validated Analytical Data Summary.

Report prepared by:  Date: 1/15/14
For Carlos Huertas
RST 2 Site Project Manager

Report reviewed by:  Date: 1/15/14
Timothy Benton
RST 2 Operations Manager

ATTACHMENT A

Figure 1: Site Location Map

Figure 2: Wipe Sample Location & Analytical Results Map



Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2013

Legend



Site Location

0 0.05 0.1 0.2 0.3 0.4
Miles



Weston Solutions, Inc.
East Division

In Association With
H & S Environmental, Inc.,
Scientific and Environmental Associates, Inc.
and Avatar Environmental, LLC.

Figure 1 Site Location Map

**Puerto Rico Olefins Asbestos
Penuelas, Puerto Rico**

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL SUPPORT TEAM 2
CONTRACT # EP-W-06-072

DATE MODIFIED: 12/26/2013	GIS ANALYST: T. BENTON
	EPA OSC: A. RODRIGUEZ
	RST SPM: C. HUERTAS
	FILENAME: SITEMAP.MXD



SCALE
1:6,000

LEGEND

Wipe Sample Location

1 Mile Radius

0.5 Mile Radius

Site Boundary

Note: Due to excessive particulate the analytical sensitivity of 260 str/cm² as required by the method was not reached.

Figure 2: Wipe Sample Location & Analytical Results Map

Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REMOVAL SUPPORT TEAM 2
CONTRACT # EP-W-06-072

Weston Solutions, Inc.
In Association With
Avatar Environmental, LLC,
H & S Environmental, Inc. and
Scientific and Environmental Associates, Inc.,

GIS ANALYST:	T. BENTON
EPA OSC:	A. RODRIGUEZ
RST 2 SPM:	C. HUERTAS
FILENAME:	Wipe Sample Map.mxd
FIGURE	1
REVISION	1
DATE MODIFIED	1/7/2014

ATTACHMENT B

Table 1: Sample Collection Information

Table 2: Validated Analytical Data Summary

Table 1: Sample Collection Information
Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
December 17 through 19, 2013

Sample No.	Sample Area	Area Surface	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type
P0005-WP01-01	Emergency Generator	Metal	Facility Entrance	12/17/2013	9:50	Wipe	Grab	Asbestos - TEM	Field Sample
P0005-WP02-01	Tool Box	Metal	Tool Storage Unit	12/17/2013	11:45	Wipe	Grab	Asbestos - TEM	Field Sample
P0006-WP01-01	Top of Air Conditioner	Metal	Facility Entrance	12/17/2013	10:17	Wipe	Grab	Asbestos - TEM	Field Sample
P0007-WP01-01	Sink (more than 2 years since cleaned)	Metal	Underneath House	12/17/2013	10:36	Wipe	Grab	Asbestos - TEM	Field Sample
P0008-WP01-01	Suitcase (more than 1 year since cleaned)	Plastic	Hardware Patio	12/17/2013	11:08	Wipe	Grab	Asbestos - TEM	Field Sample
P0009-WP01-01	Drill Machine	Metal	Workshop Area	12/17/2013	11:28	Wipe	Grab	Asbestos - TEM	Field Sample
P0010-WP01-01	Cabinet	Metal	Attached Garage	12/17/2013	13:30	Wipe	Grab	Asbestos - TEM	Field Sample
P0011-WP01-01	Table in Workshop	Wood	Workshop House	12/17/2013	14:23	Wipe	Grab	Asbestos - TEM	Field Sample
P0012-WP01-01	Shelf	Wood	Attached Garage	12/17/2013	14:40	Wipe	Grab	Asbestos - TEM	Field Sample
P0013-WP01-01	Top of Bubblegum Machine	Metal	Dining Room Cafeteria	12/17/2013	15:02	Wipe	Grab	Asbestos - TEM	Field Sample
P0014-WP01-01	Toy Shelf	Wood	Head Start Encarnacion	12/17/2013	15:13	Wipe	Grab	Asbestos - TEM	Field Sample
P0015-WP01-01	Pallet under Washing Machine	Wood	Balcony	12/17/2013	15:42	Wipe	Grab	Asbestos - TEM	Field Sample
P0016-WP01-01	Top of Ceiling Lamp	Metal	Porch	12/17/2013	16:00	Wipe	Grab	Asbestos - TEM	Field Sample
P0017-WP01-01	Top of Balcony Wall	Concrete	Balcony	12/18/2013	10:00	Wipe	Grab	Asbestos - TEM	Field Sample
P0018-WP01-01	Top of Garage Wall	Concrete	Garage	12/18/2013	10:15	Wipe	Grab	Asbestos - TEM	Field Sample
P0019-WP01-01	Tile Floor	Tile	Storage Room	12/18/2013	10:37	Wipe	Grab	Asbestos - TEM	Field Sample
P0020-WP01-01	Top of Cistern	Plastic	Garage	12/18/2013	10:53	Wipe	Grab	Asbestos - TEM	Field Sample
P0021-WP01-01	Top of Table	Wood	Garage	12/18/2013	11:48	Wipe	Grab	Asbestos - TEM	Field Sample
P0022-WP01-01	Top of Washer	Metal	Garage	12/18/2013	14:18	Wipe	Grab	Asbestos - TEM	Field Sample
P0023-WP01-01	Top of Refrigerator	Metal	Garage	12/19/2013	14:10	Wipe	Grab	Asbestos - TEM	Field Sample
P0024-WP01-01	Closet Table	Wood	Exterior Storage	12/19/2013	14:34	Wipe	Grab	Asbestos - TEM	Field Sample
P0025-WP01-01	Chair	Wood	Garage	12/19/2013	14:48	Wipe	Grab	Asbestos - TEM	Field Sample
P0026-WP01-01	Drum	Plastic	Exterior Under Stairs	12/19/2013	15:05	Wipe	Grab	Asbestos - TEM	Field Sample
P0027-WP01-01	Table	Glass	Exterior Storage	12/19/2013	15:30	Wipe	Grab	Asbestos - TEM	Field Sample
P0028-WP01-01	Floor	Tile	Second Floor Porch	12/19/2013	16:08	Wipe	Grab	Asbestos - TEM	Field Sample
FB-121713	NA	NA	NA	12/17/2013	14:00	Wipe	Grab	Asbestos - TEM	Field Blank
FB-121913	NA	NA	NA	12/19/2013	14:00	Wipe	Grab	Asbestos - TEM	Field Blank

NA: Not Applicable

TEM: Transmission Electron Microscopy

Table 2: Validated Analytical Data Summary
Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
December 17 through 19, 2013

Sample #	Sample Area	Area Surface	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Asbestos Type	Asbestos Structures	Sensitivity * (str/cm²)	Concentration (str/cm²)
P0005-WP01-01	Emergency Generator	Metal	Facility Entrance	12/17/2013	9:50	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	108	80,800	8,730,000
P0005-WP02-01	Tool Box	Metal	Tool Storage Unit	12/17/2013	11:45	Wipe	Grab	Asbestos - TEM	Field Sample	None Detected	<2.99	9,700	<29,000
P0006-WP01-01	Top of Air Conditioner	Metal	Facility Entrance	12/17/2013	10:17	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	133	242,000	32,200,000
P0007-WP01-01	Sink (more than 2 years since cleaned)	Metal	Underneath House	12/17/2013	10:36	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	<2.99	48,500	<145,000
P0008-WP01-01	Suitcase (more than 1 year since cleaned)	Plastic	Hardware Patio	12/17/2013	11:08	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	29	16,200	470,000
P0009-WP01-01	Drill Machine	Metal	Workshop Area	12/17/2013	11:28	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	10	48,500	485,000
P0010-WP01-01	Cabinet	Metal	Attached Garage	12/17/2013	13:30	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	12	9,700	116,000
P0011-WP01-01	Table in Workshop	Wood	Workshop House	12/17/2013	14:23	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	6	16,200	97,200
P0012-WP01-01	Shelf	Wood	Attached Garage	12/17/2013	14:40	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	54	1,940	105,000
P0013-WP01-01	Top of Bubblegum Machine	Metal	Dining Room Cafeteria	12/17/2013	15:02	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	8	16,200	130,000
P0014-WP01-01	Toy Shelf	Wood	Head Start Encarnacion	12/17/2013	15:13	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	7	4,850	34,000
P0015-WP01-01	Pallet under Washing Machine	Wood	Balcony	12/17/2013	15:42	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	4	4,850	19,400
P0016-WP01-01	Top of Ceiling Lamp	Metal	Porch	12/17/2013	16:00	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	10	9,700	97,000
P0017-WP01-01	Top of Balcony Wall	Concrete	Balcony	12/18/2013	10:00	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	8	16,200	130,000
P0018-WP01-01	Top of Garage Wall	Concrete	Garage	12/18/2013	10:15	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	11	16,200	178,000
P0019-WP01-01	Tile Floor	Tile	Storage Room	12/18/2013	10:37	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	8	4,860	38,900
P0020-WP01-01	Top of Cistern	Plastic	Garage	12/18/2013	10:53	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	11	1,940	21,300
P0021-WP01-01	Top of Table	Wood	Garage	12/18/2013	11:48	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	3	48,500	146,000
P0022-WP01-01	Top of Washer	Metal	Garage	12/18/2013	14:18	Wipe	Grab	Asbestos - TEM	Field Sample	Actinolite Chrysotile	17	1,940	33,000
P0023-WP01-01	Top of Refrigerator	Metal	Garage	12/19/2013	14:10	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	17	3,230	54,900
P0024-WP01-01	Closet Table	Wood	Exterior Storage	12/19/2013	14:34	Wipe	Grab	Asbestos - TEM	Field Sample	None Detected	<2.99	4,850	<14,500
P0025-WP01-01	Chair	Wood	Garage	12/19/2013	14:48	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	20	1,940	38,800
P0026-WP01-01	Drum	Plastic	Exterior Under Stairs	12/19/2013	15:05	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	10	485	4,850
P0027-WP01-01	Table	Glass	Exterior Storage	12/19/2013	15:30	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	16	485	7,760
P0028-WP01-01	Floor	Tile	Second Floor Porch	12/19/2013	16:08	Wipe	Grab	Asbestos - TEM	Field Sample	Chrysotile	16	2,420	38,700
FB-121713	NA	NA	NA	12/17/2013	14:00	Wipe	Grab	Asbestos - TEM	Field Blank	None Detected	<2.99	-	-
FB-121913	NA	NA	NA	12/19/2013	14:00	Wipe	Grab	Asbestos - TEM	Field Blank	None Detected	<2.99	-	-

* Due to excessive particulate the analytical sensitivity of 260 str/cm² as required by the method was not reached.

NA - Not Applicable

str/cm² - Structures per centimeter squared

ATTACHMENT C

Chain of Custody Records and FedEx Airbills

USEPA

Date Shipped: 12/18/2013

RFP# 272D

PO# 0084577

CHAIN OF CUSTODY RECORD

Site #: 0029 - 0122

Contact Name: Smita Sumbaly

Contact Phone: 732-585-4400

No: 2-121813-114511-0011

Cooler #: 1

Lab: EMSL

Lab Phone: 800-220-3675

041334096

Lab #	Sample #	Analyses	Matrix	Collect on Method	Collected	Sample Time	Numb Cont	Container	Preservative	Area Width	Area Length	Vol Units	Lab QC
	FB-121713	Asbestos TEM	Wipe	Grab	12/17/2013	14:00	1	Plastic Bag	None	0	0	cm	N
	P0005-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	09:50	1	Plastic Bag	None	10	10	cm	N
	P0005-WP02-01	Asbestos TEM	Wipe	Grab	12/17/2013	11:45	1	Plastic Bag	None	10	10	cm	N
	P0006-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	10:17	1	Plastic Bag	None	10	10	cm	N
	P0007-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	10:36	1	Plastic Bag	None	10	10	cm	N
	P0008-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	11:08	1	Plastic Bag	None	10	10	cm	N
	P0009-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	11:28	1	Plastic Bag	None	10	10	cm	N
	P0010-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	13:30	1	Plastic Bag	None	10	10	cm	N
	P0011-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	14:23	1	Plastic Bag	None	10	10	cm	N
	P0012-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	14:40	1	Plastic Bag	None	10	10	cm	N
	P0013-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	15:02	1	Plastic Bag	None	10	10	cm	N
	P0014-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	15:13	1	Plastic Bag	None	10	10	cm	N
	P0015-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	15:42	1	Plastic Bag	None	10	10	cm	N
	P0016-WP01-01	Asbestos TEM	Wipe	Grab	12/17/2013	16:00	1	Plastic Bag	None	10	10	cm	N
	P0017-WP01-01	Asbestos TEM	Wipe	Grab	12/18/2013	10:00	1	Plastic Bag	None	10	10	cm	N
	P0018-WP01-01	Asbestos TEM	Wipe	Grab	12/18/2013	10:15	1	Plastic Bag	None	10	10	cm	N
	P0019-WP01-01	Asbestos TEM	Wipe	Grab	12/18/2013	10:37	1	Plastic Bag	None	10	10	cm	N
	P0020-WP01-01	Asbestos TEM	Wipe	Grab	12/18/2013	10:53	1	Plastic Bag	None	10	10	cm	N

SAMPLES TRANSFERRED FROM

CHAIN OF CUSTODY

Special Instructions: 24 Hour TAT Preliminary Data. Email results to Carlos.Huertas@WestonSolutions.com, Joel.Petty@WestonSolutions.com, and S.Sumbaly@WestonSolutions.com

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
all samples attached	Joel Petty RST	12/18/13 1530	UNAMALLOWS EMSL	12/19/13 10:41am	acceptable



CHAIN OF CUSTODY RECORD

No: 2-121813-114511-0011

USEPA
DateShipped: 12/18/2013

Site #: 0029 - 0122

Cooler #: 1

Contact Name: Smita Sumbaly

Lab: EMSL

Contact Phone: 732-585-4400

Lab Phone: 800-220-3675

PO# 0084577

041334096

[illegible]

Paula

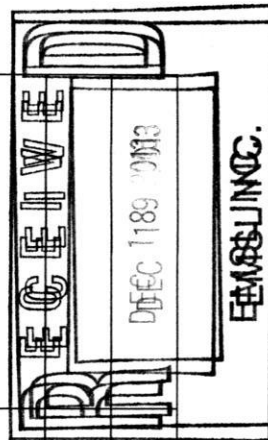
SAMPLES TRANSFERRED FROM	CHAIN OF CUSTODY #

Special Instructions: 24 Hour TAT Preliminary Data. Email results to Carlos.Huertas@WestonSolutions.com, Joel.Petty@WestonSolutions.com, and S.Sumbaly@WestonSolutions.com

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
all samples all analysis	Jed Petty RST 2	12/18/13 1530	UNM Melborne ems1	12/19/13 10:41 am	Acceptable

RECEIVED

DEC 18 2013



No: 2-122013-105549-0012

Cooler #: 1

Site #: 0029 - 0122

Contact Name: Smita Sumbaly

Lab. EMIL

Contact Name: Smita Sumbaly

Lab Phone: 800-220-3675

CHAIN OF CUSTODY RECORD

[illegible]

SAMPLES TRANSFERRED FROM

CHAIN OF CUSTODY #

Special Instructions: 24 Hour TAT Preliminary Data. Email results to Carlos.Huertas@WestonSolutions.com, Inel.Petty@WestonSolutions.com, and S.Sumbaly@WestonSolutions.com

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
all samples all analyses	Jed Petty RST2	12/20/13 1532			
			DWB - H-1130A	12.21.13	

⑦

FedEx International Air Waybill

EXPRESS

From Please print and print hard
Date 12/18/13 Sender's FedEx
Account Number

Sender's Name Joel Petty Phone 732-570-4943

Company Weston Solutions, Inc

Address 700 Europa Street

Address Fernandez Jones Corner, Suite 206

On Santurce State PR

Country USA ZIP Postal Code 00910

To Recipient's Name Phone 800-220-3675

Company EMSL Analytical

Address 200 Route 130 North

Address

City Cinnaminson State NJ

Country USA ZIP Postal Code 08077

Recipient's Tax ID Number for Customs Purposes
U.S. DEPARTMENT OF COMMERCE, or its locally registered

3 Shipment Information
Total Packages 1 Total Weight 2.33 LBS
Number of Pieces 1

Commodity Description Environmental Samples

Quantity of Pieces 0

Declared Value 0

Insurance 0

Signature of Shipper

Signature of Recipient

Sender's Copy

4 Express Package Service
X FedEx Int. Priority
FedEx Int. First
FedEx Int. Economy
FedEx Int. Standard
FedEx Int. Economy
FedEx Int. Standard
FedEx Int. Economy
FedEx Int. Standard

5 Packaging
FedEx Envelope
FedEx Pak
FedEx Box
FedEx Tube
FedEx Mailer
FedEx Mailbox
FedEx Mailbox
FedEx Mailbox

6 Special Handling
HOLD at FedEx location
SATURDAY Delivery
Signature Required
Signature Required
Signature Required
Signature Required

7 Payment
RTT (transmission charges for)
Sender's Account
Recipient's Account
Sender's Account
Recipient's Account
Sender's Account
Recipient's Account

8 Your Internal Billing Reference
7123

9 Required Signatures
Sender's Signature
Recipient's Signature
Sender's Signature
Recipient's Signature
Sender's Signature
Recipient's Signature

For Completion Instructions, see back of fifth page.

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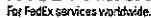
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568

0402



3 Shipment Information ☐ For EU Only. Tick here if goods are not in free circulation and provide C.I.

Total Packages 1 **Total Weight** 2.5 **DIM** 1 1 1 in. cm

Commodity Description **Harmonized Code** **Country of Manufacture** **Value for Customs**

Environmental Samples USA USD

Has EEL been filed in AEST? ☒ No EEL required, value \$2,500 or less per Sch. B Murreder, no license required (NLR), not subject to ITR. **Total Declared Value for Carriage** 0 **Total Value for Customs (Specify Currency)** 0

☐ No EEL received, enter customs value: **If other than NLR, enter license Exception:**

☐ Yes - Enter AES proof of filing citation:

Or in the U.S., call 1.800.GoFedEx 1.800.463.3339. Outside the U.S., call your local FedEx office

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[illegible]

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ATTACHMENT D

Photographic Documentation Log

Photographic Documentation Log
Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
December 17 through 19, 2013



Photo 1: Sample P0006-WP01-01. Sample collected at the exterior of a business close to the Site. Location with a chrysotile asbestos concentration of 32,200,00 str/cm².



Photo 2: Sample P0011-WP01-01. Sample was collected a workshop.

Photographic Documentation Log
Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
December 17 through 19, 2013



Photo 3: Sample P0022-WP01-01. actinolite and chrysotile asbestos were detected at this property.



Photo 4: Sample P0014-WP01-01. Location with an asbestos concentration of $34,000 \text{ str/cm}^2$.